



Department of Energy

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OCT 04 2002

Mr. James A. Saric, Remedial Project Manager  
United States Environmental Protection Agency  
Region V-SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0007-03

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5<sup>th</sup> Street  
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY  
COMMENTS AND THE REVISED PROJECT SPECIFIC PLAN FOR AREA 7, PHASE I  
PRECERTIFICATION PHYSICAL SAMPLING AND REAL-TIME SCAN**

Reference: Letter, T. Schneider to J. Reising, "Disapproval - PSP for Area 7, Phase I  
Precertification Physical Sampling and Real-Time Scan," dated  
September 20, 2002

Enclosed for your approval are responses to the Ohio Environmental Protection Agency  
(OEPA) comments and the revised Project Specific Plan for Area 7, Phase I Precertification  
Physical Sampling and Real-Time Scan. Comment responses have already been  
incorporated into the enclosed revision.

If you have any questions or need further information, please contact Robert Janke at  
(513) 648-3124.

Sincerely,

Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:R.J. Janke

Enclosure: As Stated

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Mr. James A. Saric  
Mr. Tom Schneider

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DOE-0007-03

## cc w/ enclosure:

R. J. Janke, OH/FEMP  
T. Schneider, OEPA-Dayton (three copies of enclosure)  
M. Cullerton, Tetra Tech  
AR Coordinator, Fluor Fernald, Inc./MS78

## cc w/o enclosure:

R. Greenberg, EM-31/CLOV  
R. Abitz, Fluor Fernald, Inc./MS46  
K. Blades, Fluor Fernald, Inc./MS64  
D. Carr, Fluor Fernald, Inc./MS2  
J. Chiou, Fluor Fernald, Inc./MS64  
T. Hagen, Fluor Fernald, Inc./MS9  
E. Kroger, Fluor Fernald, Inc./MS64  
F. Miller, Fluor Fernald, Inc./MS64  
ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY  
COMMENTS ON THE DRAFT PROJECT SPECIFIC PLAN  
FOR AREA 7, PHASE I PRECERTIFICATION  
PHYSICAL SAMPLING AND REAL-TIME SCAN  
(20500-PSP-0003, REVISION A)**

**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT**

**GENERAL COMMENTS**

Commenting Organization: Ohio EPA

Commentator: OFFO

Section #: General Comment

Pg. #:

Line #:

Code: C

Original Comment #: 1

**Comment:** Though the plan lays out a reasonable strategy for precertification in the area, it fails to acknowledge the reality of the future use of the area. It is unclear how this precertification relates the fact that dirty operations with potentially new contaminants will be occurring in the area thus negating any precertification data. The document must more clearly state the intent of this sampling strategy as related to the future OU4 activities in the area.

**Response:** The intent of this precertification effort is to ensure that all accessible impacted material has been removed prior to construction activities related to the Silos Treatment Facility, it's associated warehouse, and rail spurs. DOE intends to minimize the volume of impacted material that must be excavated after 2005. The real-time scanning results coupled with the results of any physical samples will provide a level of confidence that the excavation has captured all of the impacted material that is available. This analytical activity is an interim step in the remediation of Area 7. DOE realizes that potentially new contaminants may be introduced during treatment operations. Therefore, after the Silos Project has completed their activities in this area, the SDFP will undergo additional predesign activities, excavate where necessary with an approved plan, and follow on with precertification and final certification of the area.

**Action:** Revise Section 1.2 of this PSP to read:

"The objectives of precertification activities detailed in this project specific plan (PSP) are to: 1) evaluate any patterns of residual surface soil contamination in A7PI, and 2) ensure that all accessible impacted material has been removed prior to construction activities related to the Silos Treatment Facility, it's associated warehouse, and rail spurs. The real-time scanning results, coupled with the results of any physical samples, will provide a level of confidence that the excavation has captured all of the impacted material that is available. If data collected under this plan indicate radiological and arsenic concentrations are low enough to likely pass certification statistical analysis, then remedial activities will be discontinued. Otherwise, soil impacted above the final remediation level (FRL) will be removed. This analytical activity is an interim step in the remediation of Area 7."

Commenting Organization: Ohio EPA  
Section #: General Comment Pg. #:  
Original Comment #: 2

Line #:

Commentator: OFFO  
Code: C

Comment: Ohio EPA's July 12, 2002 conditional approval letter on the "Area 7 Excavation Plan, Phase 1, Rev. B Draft" required the development of an as-built drawing delineating which FRL exceedance locations had been removed and which had remained unexcavated. The document fails to address this requirement nor does it provide a good drawing showing the extent of excavation and the removal of specific sample locations. The precertification PSP should include the post-excavation report referenced in Ohio EPA's prior letter.

Response: DOE is still committed to provide a post-excavation report with a drawing delineating the extent of all excavations that occurred under the "Area 7 Excavation Plan, Phase 1, Draft Revision B" and any known above-FRL conditions. Figure 2-2 shows the locations that have not been excavated which were not included in the Excavation Plan. The locations that have not been excavated will be addressed in future excavation plans. The post-excavation report containing the as-built drawing for the entire area that is covered under the Excavation and all data from this PSP will be submitted as a separate document after the excavation has been completed. This report will also describe the sequence of all of the future excavations to be conducted in the Silos area.

Action: None.

#### SPECIFIC COMMENT

Commenting Organization: Ohio EPA  
Section #: 2.2 Pg. #: 2-5  
Original Comment #: 3

Line #: 31-34

Commentator: OFFO  
Code: C

Comment: If the area has yet to be excavated, it seems inappropriate to prescribe precertification sampling locations. Such pre-decision makes it more likely that excavation could be biased over excavate in those areas. Additionally, considering the dirty OU4 operations in this area may lead to additional contaminant introduction into the area a future precertification PSP will be required for the entire area. As stated in the first comment, there is significant confusion regarding DOE's strategy for certification in this area.

Response: Agree. As stated in the response to General Comment No. 1, DOE recognizes that recontamination of the area due to Silos operations is possible. The intent of this precertification activity is to verify that all accessible impacted material has been captured during this excavation. This data will also be used as a basis for future predesign or precertification activities once the Silos Project has completed their activities in the area. Final certification sampling will be accomplished only after a Certification Design Letter (CDL) and PSP have been submitted and approved by EPA. The CDL and PSP will discuss all predesign and precertification data.

Action: None.